

CLARKE

Power Services

3133 E. Kemper Rd. • Cincinnati, OH 45241 • (513) 771-2200 • Fax: (513) 771-0520

December 18, 2017

Stephen Healy
EPA OTAQ Compliance Division
2565 Plymouth Road
Ann Arbor, MI 48105

Re: Glider Manufacture Small Business Qualification

Dear Mr. Healy:

This letter serves to inform you that Clarke Power Services, Inc. manufactures glider vehicles under NAICS code 336120, which are excluded under 40 C.F.R. 1037.150(c). The information below is provided in support of this declaration:

Clarke Power Services, Inc. Ownership and Affiliates:

Clarke Power Services, Inc. has two wholly owned subsidiaries, Clarke Fire Protection Products, Inc., and Vehicare Asset Management Group, Inc. The ownership and employment information provided below is inclusive of these entities.

Shareholder	Ownership %
Mark M. Andreae Trust	32.4%
David P. Taylor II Trust	11.1%
Andreae J. Waanders	10.6%
R. Jamison Williams, Jr.	8.9%
Tod Culpan Williams	8.9%
Wendy Williams Powers	6.6%
Mary Ann Crete	5.6%
Christopher Andreae	4.6%
Kirk M. Andreae	4.6%
Alexander C. Taylor	1.2%
Grant M. Taylor	1.2%
John P. Taylor	1.2%
Ursula C. Taylor	1.2%
Billie Tsien	0.8%
John MacKenzie Waanders	0.4%
Taylor Doores Waanders	0.4%

Total number of employees for Clarke Power Services, Inc. (including affiliates):

Year	Employees
2017	749
2016	727
2015	682

Total number of gliders built per year:

Year	Glider Builds
2010	
2011	
2012	
2013	
2014	

Please feel free to contact me at kandreae@clarkepsi.com if you have any questions, or require additional information.

Sincerely,



Kirk M. Andreae
President
Clarke Power Services, Inc.